

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

JOHN BARNHARDT, *et al.*,

Plaintiffs,

and

UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

v.

MERIDIAN MUNICIPAL SEPARATE  
SCHOOL DISTRICT, *et al.*,

Defendants.

Civil Action No. 4:65-cv-01300-HTW-LRA  
1300(E)

**[JOINT PROPOSED] PROTECTIVE ORDER**

During the telephone conference held on December 19, 2018, this Court ordered the District to produce and allow Private Plaintiffs to have copies of the student discipline records responsive to Plaintiffs' October 1, 2018 Request for Production No. 21. The disclosure of the student discipline records shall adhere to the following conditions:

Any and all documents produced shall be held confidential. Such confidential information shall be used only in connection with this litigation and any appeal of this action, including the enforcement of any order or settlement. Such confidential information shall not be used for any other purpose and shall not be publicly disclosed or otherwise disclosed to any other person or entity except as expressly provided in this Order.

1. Such confidential information shall be made available only to "Qualified Persons" who shall read this Order. Neither the parties, their counsel, nor any other person with access may disclose confidential information subject to this Protective Order to anyone who is not a

“Qualified Person.” “Qualified Persons” means (a) counsel for parties, their partners, associates, and employees who actually are assisting in the litigation; (b) the Defendants and their employees; (c) experts and consultants hired to assist the parties in the litigation; and (d) the Court and officers of the Court.

2. If confidential information is used in depositions or as deposition exhibits, the confidential portions of the deposition testimony and exhibits shall be marked as confidential and sealed if the District makes a statement to that effect on the record and/or by advising the court reporter within fifteen days of the conclusion of the deposition.

3. If the parties intend to file, submit, or use in hearings or at trial before this Court, confidential information, such confidential information shall be submitted under seal, redacted to remove the confidential information, or handled as agreed by the parties upon approval of the Court. Counsel shall comply with Local Rule 79 regarding the sealing of documents.

4. Any violation of the terms of this Protective Order may subject the violator to sanctions as determined appropriate and ordered by the Court.

5. The terms of this Order shall survive any final disposition of this case, absent further Order of the Court, or written agreement of the parties hereto.

6. No modification or amendment of this Protective Order is permitted except by Order of this Court or by writing signed by counsel for the parties and approved by the Court.

SO ORDERED this \_\_\_\_ day of January, 2019.

s/ Kristen A. Johnson  
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Kristen A. Johnson

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HONORABLE HENRY T. WINGATE  
UNITED STATES DISTRICT JUDGE